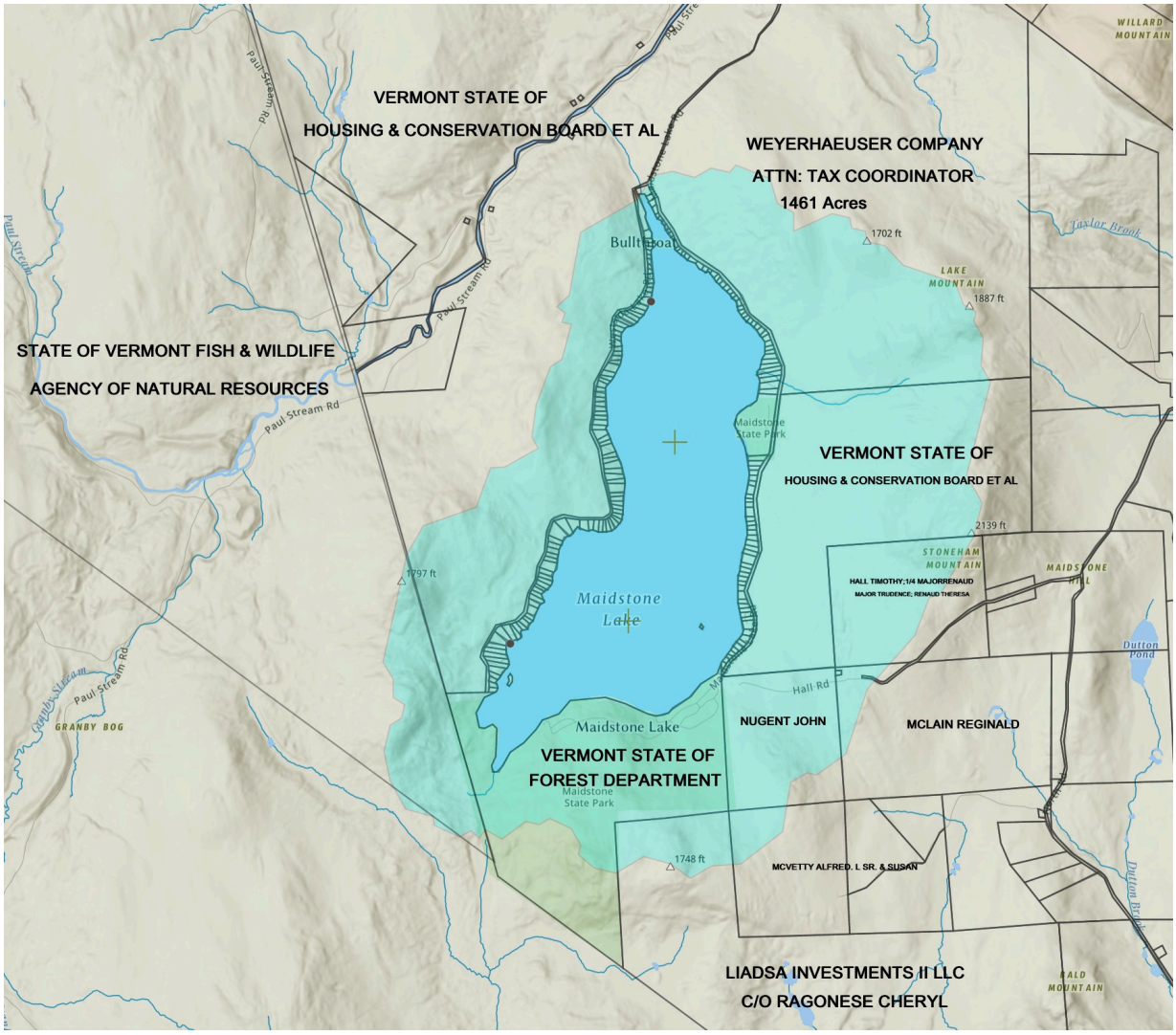
Reclassification of Maidstone Lake
Essex County, Vermont
September 5, 2021



Major Stakeholders Surrounding Maidstone Lake
and Its Watershed (area shaded green)

Petitioner:
Town of Maidstone, Vermont
PO Box 118
Guildhall, VT 05905

Petition Form Submittal Instructions
• **If submitting via US post:** **<u>Mail to:</u>** Lakes and Ponds Program Watershed Management Division One National Life Drive, Davis 3 Montpelier, VT 05620 o Please submit a CD or flash drive for petitions that contain large files (1 MB or greater) • **Petitions can also be submitted via email to the following address:** oliver.pierson@vermont.gov with the Subject Line of "Reclassification Petition" or "Reclassification Application"

1. Petitioner Name - Individual or organization	**Town of Maidstone**		
2. Address	**Street/P.O. Box**		
	508 Vermont Route 102, PO Box 118		
	Town	**State**	**Zip Code**
	Guildhall	**VT**	**05905**
3. Phone	(802) 676-3210		
4. Email of contact person	**cvonalt@gmail.com**		
5. Petition Preparer Name	**Christopher von Alt**		
6. Co-Sponsors	**Maidstone Lake Association, Essex County Natural Resource Conservation District**		

7. Waterbody Name(s)	**Maidstone Lake**		
8. Portion of waterbody for petition	**Location (add stream reach id if applicable)**	**Waterbody Coordinates (DD)**	**Elevation (ft.)**
	From: To:	Latitude: **44.66 N** Longitude: **-71.65 W**	**1,348 feet**

9. Petition Type (*Check one*)	☐ Reclassification (stream / river)	**X** Reclassification (lake or pond)	

Reclassification Only (#x)			
10. Waterbody Use proposed to be reclassified, current, and proposed classification. See Vermont Water Quality Standards §29A-306 for description of each use	**Use:**	**Proposed:**	**Current Use:**
	☐ Aquatic Biota	A(1)☐ A(2)☐ B(2)☐	**B(2)**
	☐ Aquatic Habitat	A(1)☐ A(2)☐ B(2)☐	**B(2)**
	X Aesthetics	A(1)X A(2)☐ B(2)☐	**B(2)**
	☐ Fishing	A(1)☐ A(2)☐ B(2)☐	**B(2)**
	X Swimming	A(1)X A(2)☐ B(2)☐	**B(2)**
	☐ Boating	A(1)☐ A(2)☐ B(2)☐	**B(2)**
	☐ Public Water Source	A(1)☐ A(2)☐ B(1)☐ B(2)☐	**B(2)**
Other	☐ Riparian Habitat ☐ Rare Species ☐ Significant Natural Communities ☐ Upland Uncommon Natural Community ☐ Highest Priority Riparian Connectivity ☐ Exemplary Surface Waters ☐ Highest Priority Habitat Block, Connectivity Block, and Interior Forest Block	A(1)☐ A(2)☐ B(1)☐ B(2)☐	

Reclassification Criteria	
Reclassification Criteria 11. List specific criteria per the Vermont Water Quality Standards (2017), Environmental Protection Rule Chapter 29A	**See Attachement 11** **Aquatic Biota:** Biological criteria *(see Appendix G. biocriteria for fish and macroinvertebrate communities in Vermont wadeable streams and rivers - Vermont Water Quality Standards, 2017)* ☐ Numeric water quality criteria (e.g., appended data records) ☐ Documentation of Rare, Threatened or Endangered species ☐ Documentation of Rare and Irreplaceable Natural Area or significant natural community ☐ Documentation of numeric water quality chemistry (e.g., nutrient levels, turbidity, dissolved oxygen levels, alkalinity, pH) ☐ Documented absence of toxic or radioactive substances ☐ Undeveloped riparian zones ☐ Limited human activity within the watershed
	Aquatic Habitat: ☐ Natural Flow Regime *(Documented attainment of hydrology and stream protection criteria - § 29A-304 of the Vermont Water Quality Standards, 2017)* ☐ Temperature (data appended) ☐ Documentation of Rare, Threatened or Endangered species ☐ Documentation of Rare and Irreplaceable Natural Area or significant natural community ☐ Undeveloped riparian zones ☐ Limited human activity within the watershed ☐ Other Aquatic Habitat Assessments (Describe or append assessment used)
	Aesthetics: **X** Documented aesthetic qualities and characteristics **X** Documented water characteristics, flows, water level, bed and channel characteristics, and flowing and falling waters in their natural condition. **X** Documented maintenance of level of water quality that provides for the attainment and maintenance of the water quality standards of downstream waters (for lakes only).

	Recreational Fishing: ☐ Documented temperature in attainment with Cold Water Fish Habitat criteria *(for use in Wild Salmonid Stream re-classification petitions)* ☐ Documented temperature in attainment with Cold Water Fish Habitat criteria *(temperature criteria in § 29A-302(B) of the Vermont Water Quality Standard)* ☐ Measures of wild salmonid densities, biomass, and age composition consistent with those expected in waters in their natural condition. ☐ Documented high incidence of accessibility to water ☐ Documented high use by anglers (i.e., fishing identified as existing use) ☐ Limited human activity within the watershed ☐ Upstream/ downstream use attainment
	Recreational Boating: ☐ Boating to the full extent naturally feasible without degradation due to artificial flow and water level management or artificial physical impediments ☐ Boating to the extent feasible with no more than minor degradation due to artificial flow and water level management or artificial impediments, and with appropriate mitigation for artificial physical impediments ☐ Prospective waters shall comply with the Hydrology Criteria in § 29A-304 of the Vermont water Quality Standards with respect to any flow alterations ☐ Areas where existing boating use has been determined to be present and where, over some appreciable distance, certain features, free flowing water and/or notable whitewater or flat-water boating opportunities are found.

	Recreational Swimming: **X** Prospective waters achieve and maintain a level of water quality compatible with very good or excellent quality swimming and other primary contact recreation with negligible risk of illness or injury from conditions that are a result of human activities. **X** Areas where existing swimming use has been determined to be present that have consistent *E. coli* values below *E. coli* criterion and which, over some appreciable distance, also possess certain high-quality features. **X** Well-known locally or regionally as a swimming area; ☐ Documented pool(s) for swimming and/or water features that are enjoyable for swimming or bathing including chutes, cascades, waterfalls, cliffs, jumping rocks;
	Public Water Source: ☐ Existing A(2) was never developed and/ or was developed but then abandoned ☐ or, prospective waters are currently managed, as necessary, for consistency with use as a public water source. Where sustained direct contact with the water occurs, waters shall be managed to achieve and maintain a negligible risk of illness or injury from conditions that are a result of human activities, ☐ or, prospective could be managed to achieve and maintain a uniformly excellent character and a level of water quality highly suitable for use as a public water source with filtration and disinfection or other required treatment.

12. Purpose and need for reclassification – i.e., why is the change in classification now warranted? (*summary*)	**See Attachment 12**
13. Town(s) adjacent to proposed waterbody (append letters of support from municipality and/or Regional Planning Commission and/or Natural Resource Conservation District and/or watershed organization	**See Attachment 13**

14. Potentially interested parties (abutting landowners, municipal and civic organizations, business interests, etc.) Provide names, address and phone numbers for each party.	**Additional information should be attached and listed in box 14.**
	See Attachment 14

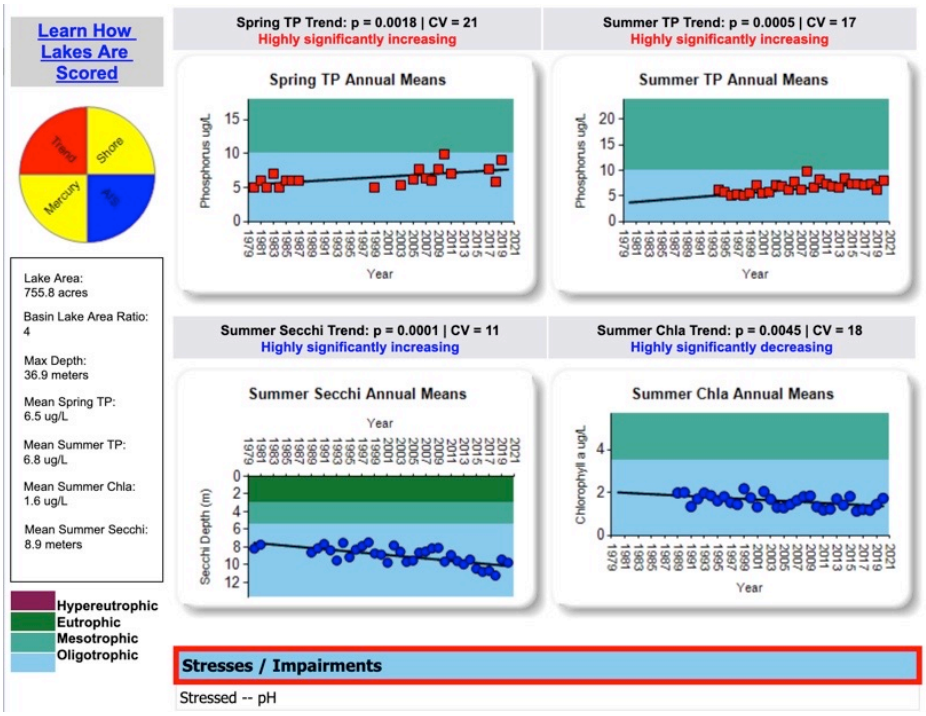
15. Supporting Documentation (maps can be created using the ANR Atlas) **required*	**Required**
	See Attachment 15 • Map with location information and delineated area for petition with known public and private conserved land within the watershed • Water quality monitoring data • Map of Rivers and streams • Map of lakes and Ponds
	Recommended
	One-page document describing: • Existing zoning or protection at town level that may preclude or • support designation • Additional map(s) that include: Watershed boundary, current land use, and waterbody encroachments, including roads and structures. • Water quality and quantity impacts, including wastewater and stormwater, physical alterations, and (if available) stream geomorphic condition • Land parcels conserved • Photos of petition area • Letter(s) of support
16. List of supporting materials attached	List attachment by number with names and dates: (ex. 1. Map of Waterbody to be Reclassified 4/5/2017; 2. Photographs of Waterbody for Reclassification 4/5/2017; 3. One Page Supporting Document 4/10/2017)
	See Attachment 16

Lead Sponsor Information			
Lead Sponsor Name:	**Town of Maidstone, Doug Lord Chair Selectboard**		
Address:	**508 Vermont Route 102, PO Box 118**	**City/Town:**	**Guildhall**
State: **VT**	**Zip:** **O5905**	**Phone:**	**(802) 676-3210**
Email Address:	**dougcarollord@gmail.com**		
Lead Sponsor Signature:	Doug Lord	**Date:**	09/05/2021

Co-Sponsor Signatures			
Name:	**Jim Mazzonna, President**		
Organization:	**Maidstone Lake Association**		
Co-Sponsor Signature:	Jim Mazzonna	**Date:**	09/05/2021
Name:	**Heather Johnson, District Manager**		
Organization:	**Essex County Natural Resource Conservation District**		
Co-Sponsor Signature:	Heather Johnson	**Date:**	09/05/2021
Name:			
Organization:			
Co-Sponsor Signature:		**Date:**	
Name:			
Organization:			
Co-Sponsor Signature:		**Date:**	

DEC use			
Coordinates from / to of affected area	From (lat/long)		To (lat/long)
	44.66646, -71.64945		**44.632634, -71.661638**
Elevation	At mouth: North end of lake		At source- end of blue line:
	422 m		**422 m**
Total drainage area km^2 at mouth or area of standing water in acres	**3.1 sqkm (area of maidstone lake)**	Drainage area of proposed water (km^2)	**12.5 sqkm Area of Watershed**
Land use	**% Natural**	**% Developed**	**% Agricultural**
	92	**8**	**0**
Available data to support specific use proposed reclassification	**See Attachment 16 for list of attached files**		
Bio site ID (RM as xx), WBID	**Bio Site ID**		**WBID**
	NA		**NA**
Map of waterbody, watershed and conserved lands in drainage	**Include attached map title below**		
	Map of conserved lands.pdf.		
Recommended Classification	A(1) for aesthetic conditions and swimming and primary contact recreation		

11.0 Reclassification Criteria



Maidstone Lake 2020 Score Card Showing Over 20 Years of Data

Aesthetic Conditions Use:

Aesthetic Qualities and Characteristics

Water characteristics, flows, water level, bed and channel

Maidstone Lake is a deep 756 acre oligotrophic lake that trends north south for 2.5 miles, with an average width of 0.5 miles. The lake contains very clear waters with mean summer Secchi depths exceeding 8.5 meters. A 100 foot plus deep canyon meanders along its center for about 1.5 miles, on a north south trend. Water flows into the lake through a great number of undocumented springs that surround the lake; there are over 100 culverts embedded in roads bordering about two-thirds of the lake that channel these flows into the lake. In addition, there are two main tributaries entering the lake that are noted in the GIS data, but the inflows from these tributaries have not been shown to balance the volume of water that exits the lake through the outlet works in an earthen dam located at the northern end of the lake. This dam, which was repaired in 2005 by Maidstone Rehold LLC, is now owned and managed by Vermont Fish and Wildlife. This dam is on the site of the first dam that was constructed in 1853 and used to operate a sawmill. That first dam reportedly raised the lake level by 6 feet from its natural state. The outflow through the dam forms Maidstone Brook, which flows into Paul Stream and then into the Connecticut River. The outlet works in the dam maintain a fairly constant lake level in the range of +/- 6-8 inches throughout the year at a nominal elevation of 1,348 feet above sea level; however, the lake is typically covered with ice for 5-6 months.

The 12.5 square kilometer lake watershed forms an amphitheater of conserved lands that are managed through a number of departments within the Vermont Agency of Natural Resources. The hills surrounding the lake rise some 200-300 feet above its shoreline. The lake's littoral zone, for the most part, is narrow due to the steep slopes that are found along most of the lakeshore. Typically, the lake's depth within 200 feet of the shore is over 10 meters. Until recently, the surrounding forests were subjected to extensive logging operations. One parcel, which is currently owned by the Weyerhaeuser Company, was extensively logged in 2019 and 2021.

The lakeshore is densely populated with over 200 building lots, most with no more than 100 foot frontage on the lake. Many homes are built right on the lake and do not provide adequate buffering of rain water. Approximately 40 homes are occupied year round. The population and use of the lake increases dramatically during the summer months. For the rest of the year, there is very little activity because the lake is typically covered with ice for at least five months. During this period, snowmobiling, snowshoeing, and ice fishing are the main activities.

For assessment of aesthetic uses, the DEC Watershed Management Division uses water quality information from field surveys. The Lay Monitoring Program that has been in place on Maidstone Lake for the past 30 years provides much of this information. Vermont DEC has performed many additional surveys and has sponsored improvements through the Lake Wise Program, education, and public outreach. The following chart, which is taken from the DEC Website, establishes and documents the aesthetic qualities and characteristics of Maidstone Lake since 1979. The link to this source is provided below; please select Maidstone Lake from the pull down menu to view this data online.

https://anrweb.vt.gov/DEC/IWIS/ReportViewer3.aspx?Report=LakeScoreCard_Current_TrendsAndStatus&ViewParms=True

Analysis by DEC and the final 2021 Basin 16 Tactical Basin Plan clearly establish that Maidstone Lake exceeds and therefore already meets the water quality standards for an A(1) designation for aesthetic uses. A comparison of the requirements for aesthetic use vs the actual conditions measured in the lake are provided in the table below.

https://dec.vermont.gov/sites/dec/files/WID/WPP/2021%20Upper%20Connecticut%20River%20Tactical%20Basin%20PlanSigned.pdf

Parameter	Requirements for Aesthetic Uses A(1)	Maidstone Lake Measurements
Total Phosphorus	Less than 12 ug/l	6.8 ug/l
Secchi Disk Depth	Greater than 5 m	8.9 m
Chlorophyll -a	Less than 6 ug/l	1.6 ug/l
Turbidity	Less than 10 NTU	?
Dissolved Oxygen	Greater than 6 mg/l	10.9 mg/l

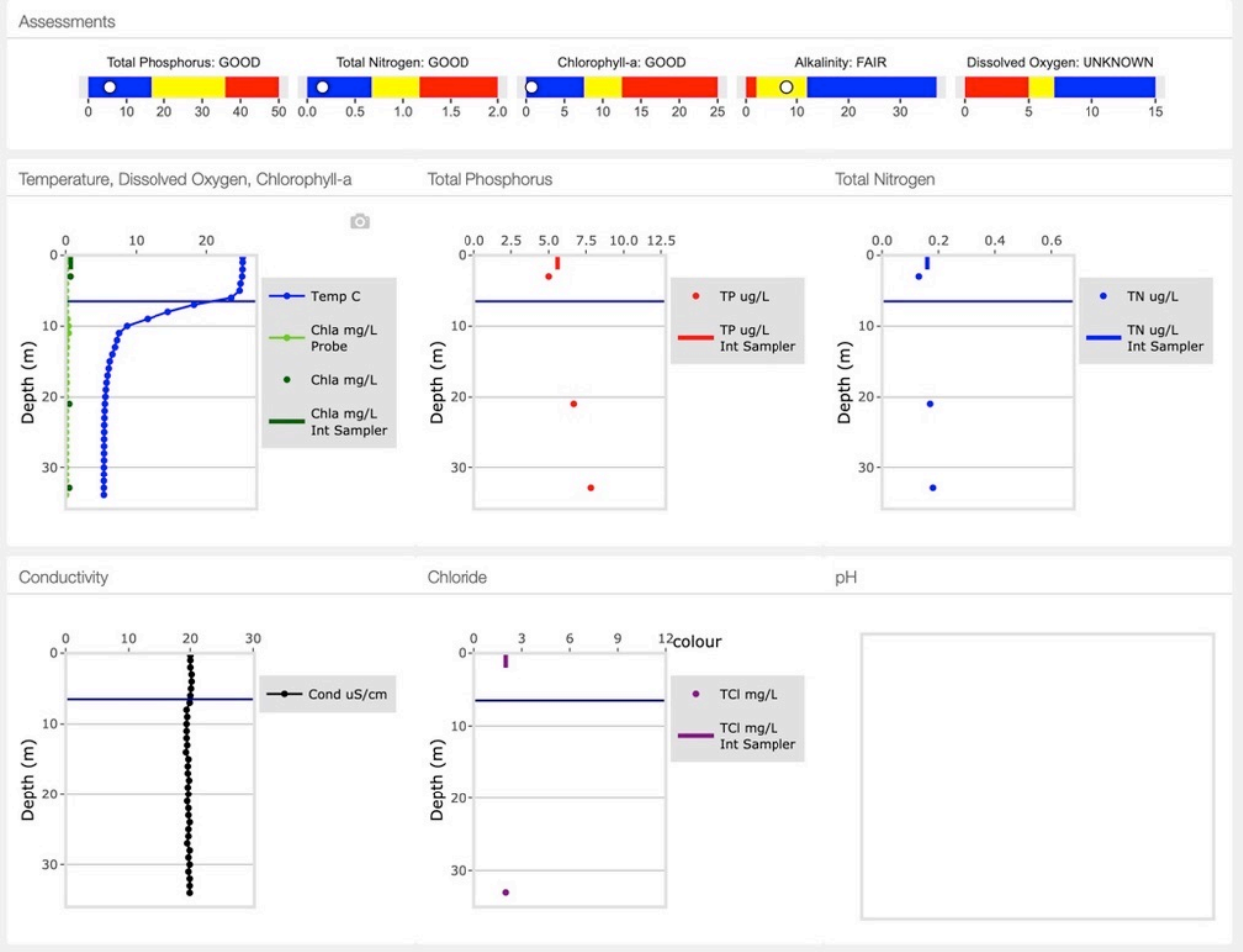
Comparison showing Maidstone Lake exceeds the required values for designation as an A(1) lake for aesthetic conditions use

TABLE 1

A 2018 Lake assessment report complied by DEC may be found at:

file:///Users/chris/Library/Containers/com.apple.mail/Data/Library/Mail%20Downloads/915C108C-F5BB-49BC-9D60-61233E9E493A/MAIDSTONE_2018_500.html

The following water quality data are contained in that report:



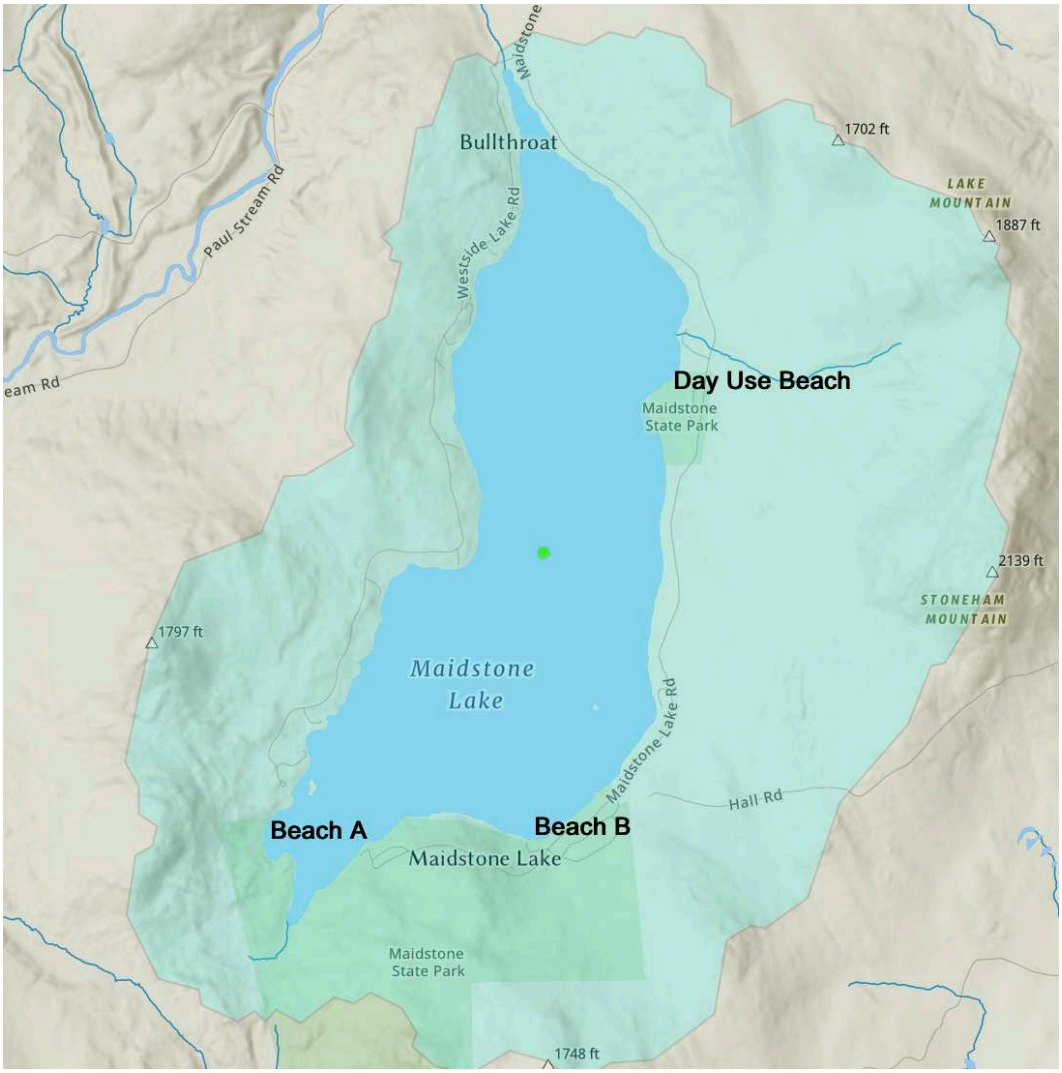
Swimming and primary contact recreation uses:

There are over 200 house lots on Maidstone Lake, and many of the owners enjoy swimming in Maidstone's crystal clear waters during the summer months. These camps occupy about two thirds of the shoreline. In addition, there are three swimming areas associated with the Maidstone State Park: Camping Beaches A & B, and the Day Use Area (Please see map below for their locations). The water at all three of these sites is sampled weekly during the summer months, while the park is open, by the Vermont Department of Forestry and Parks. Three years of the data that have been collected are included with this petition. (See attachment: Swimming data raw.pdf) The three data sets start in 2017 and end in 2021. We have been unable as of yet to obtain data for 2019 and 2020. The geometric mean E. coli counts in the EPA's preferred units of MPN/100ml for each year for which we have data are provided in the table below. None of the samples taken during any of the years was above 60 MPN/

100ml. The data provided clearly shows that the number of E. Coli organisms in the Maidstone Lake waters at these public swimming areas is far below the **maximum acceptable geometric mean of 126 organism/100ml**, which is the criteria established in VWQS for the swimming and primary contact recreation use in lakes that are classified as A(1). Maidstone Lake should therefore be reclassified to an A(1) lake for swimming and primary contact recreation.

Year	Camping Area A	Camping Area B	Day Use Area
2017	4.7	5.4	5.8
2018	2.9	4.2	4.7
2021	3.3	3.4	3.0

Yearly Maidstone Lake E. coli Measurements Taken at 3 Beaches by Department of Forestry and Parks
Geometric Mean of a Representative 60 day Period (June -August) in MPN/100 ml



Location of beaches where samples are taken

Attachment 12

12. Purpose and Need for Reclassification

The reasons and need to reclassify Maidstone Lake from a B(2) lake for aesthetic conditions and for swimming and primary contact recreation to an A(1) lake for aesthetic conditions and for swimming and primary contact recreation are:

(1) Maidstone Lake is one of the few remaining oligotrophic jewels in Vermont, and in its natural condition has total average phosphorus concentrations well below 7 ug/l based on Lay Monitoring measurements that have been taken over the past 25 years (1995 through 2020). These measurements indicate there has been a steady increase in the total phosphorus concentration in the lake of approximately 0.1 ug/L/year. This trend is disturbing because it has resulted in a 43% increase in total phosphorus levels over the past 25 years. Many other oligotrophic lakes in Vermont have also been found to have this disturbing eutrophic trend, and in many lakes these trends are much more severe. It is not fully understood why phosphorus concentrations are increasing in oligotrophic lakes. The root causes may be attributed to impacts of the climate emergency we are facing, land use disturbances within the riparian zones of the lake and the tributaries that feed it, or other sources that have not been discovered yet. If the root causes of this disturbing eutrophic trend are not established and anti-degradation measures taken, this jewel will be lost.

(2) Vermont Statute 10 V.S.A. Chapter 47 established water body classifications in Section 1252 and assigned these classifications to lakes in Vermont in Section 1253. The VWQS established uses, criteria, and anti-degradation requirements for each of these classifications. The VWQS further established that Maidstone Lake is classified as a B(2) lake for all uses as well as a cold water fish habitat.[1] (See VWQS Appendix F (c)). As shown in Table 1 above, the water quality criteria for aesthetic conditions under Maidstone Lake's current classification as a B(2) lake represent a severe degradation from the lake's documented natural condition. The B(2) classification is therefore inconsistent with the VWQS Anti-degradation Policy (Section 29A-105) (c) (1). DEC lawyers contend that the State of Vermont is not required to take any action to stem the degradation of a lake's water quality until it falls below the criteria established for its specified classification. Allowing the quality of water in Maidstone Lake to degrade to below the criteria for a B(2) lake will increase the likelihood of summer algae blooms, will increase the possibility of the Lake's waters being closed to swimming, and will make the Lake more inviting to invasive species, therefore reducing the value of lakeshore properties. To be specific, if Maidstone Lake remains classified as a B(2) lake, the increase in the concentration of phosphorus that is allowed will accelerate its deterioration, which will significantly damage the enjoyment of uses such as boating, fishing, and swimming and is therefore not in the public's interest.

(3) As stated above, the data provided clearly shows that the number of E. Coli organisms in the Maidstone Lake waters at these public swimming areas is far below the **maximum acceptable geometric mean of 126 organism/100ml**, which is the criteria established in VWQS for the swimming and primary contact recreation use in lakes that are classified as A(1). Maidstone Lake should therefore be reclassified to an A(1) lake for swimming and primary contact recreation.

(4) The issue at hand is this: Maidstone Lake is in excellent condition and exceeds the VWQS for an A(1) lake for aesthetic conditions, for fishing, and for swimming and primary contact recreation, but is currently designated as a B(2) lake. This means that Maidstone Lake's water quality is being managed by the DEC to a much lower standard than it should be. This situation is not in the best interests of the general public and local municipalities, and therefore must be corrected before the costs associated with implementing corrective measures becomes too high. Consider the significant

[1] Vermont Agency of Natural Resources, Department of Environmental Conservation, Watershed Management Division, 2017, Vermont Water Quality Standards Environmental Protection Rule Chapter 29A, Appendix F (c) pp. 66, 40.

degradation that has happened to the water quality of Lake Champlain and several other lakes in Vermont. A study conducted by UVM demonstrates that declining water quality resulted in significant, measurable declines in property values on Lake Champlain. In addition, degradation has caused beach closures, fishing restrictions during the summer, and the infestation of lakes by invasive aquatic species that are extremely expensive to control and combat. It is obviously not in the best interests of our communities to let the water quality in Maidstone Lake degrade to this point.

Attachment 13

13. Town(s) adjacent to Maidstone, Vt

Granby:

Town Clerk: Sheryl Brown **Phone:** 802-328-3611 **Fax:** 802-328-2200

Email: townofgranby@myfairpoint.net

Address: 9005 Granby Road; Granby, VT 05840

An email was sent to the town requesting support and there was no response.

Guildhall:

Town Clerk: George Blakeslee Phone: 802-676-3797 Fax : 802-676-3518

Email: townclerk@guildhallvt.org

Address: 13 Courthouse Drive (Physical) P.O. Box 10 (Mailing) Guildhall, Vermont 05905

For letter of support see Attachment: Letters of Support.pdf

Brunswick

Town Clerk: Sharon Graham Phone: 802-962-5514 Fax :

Email: bruns321@sover.net

Address: 994 VT Rte 102; Brunswick, VT 05905

An email was sent to the town requesting support and there was no response.

Ferdinand

Town Clerk: Gina Vigneault Phone: 802-723-5900 Fax :

Email: utgoffice@myfairpoint.net

Address: Island Pond, VT 05846

For letter of support see Attachment: Letters of Support.pdf

Regional Planing Commission

Northeast Vermont Development Association

POC: Frank Maloney, Water Quality Management Phone: 802-748-5181

Email: fmaloney@nvda.net

Address: 36 Eastern Ave, Suite 1, PO Box 630 St. Johnsbury, VT 05819

For letter of support see Attachment: Letters of Support.pdf

Natural Resource Conservation District

Essex County Natural Resource Conservation District

POC: Hannah Fay

Phone: (802) 424-5353 Fax:

Email: hfay.essexnrcd@gmail.com

Address: 5396 VT-105, Brunswick, VT 05905

For letter of support see Attachment: Letters of Support.pdf

Attachment 14

List of abutting land owners:

See attached file:

Maidstone abutting landowners.pdf

see attached file: Signatures_lake_owners.pdf

Civic Organization:

Maidstone State Park

Name: Susan K. Bulmer | Northeast Parks Regional Manager (she/her)

Address Vermont Agency of Natural Resources | Department of Forests, Parks & Recreation State Parks Division, Barre District Office 5 Perry St, Suite 20 |Barre, VT 05641

Phone 802-476-0181 office | 802-371-8918 cell

Fax: 802-476-0129

Email: susan.bulmer@vermont.gov

An email was sent requesting support, we informed that they could not take a position on the petition because they would be part of the evaluation process

Forests, Parks & Recreation (West Mountain Wildlife)

Name Bushey, Louis C

Address St Johnsbury

Phone Cell: 802-535-8410

Email louis.bushey@vermont.gov

An email was sent requesting support, we informed that they could not take a position on the petition because they would be part of the evaluation process

Business Interest:

Weyerhaeuser

Name: Christopher Fife

Address

Phone: 207-453-1051 or 802-473-0866

Email: Name: chris.Fife@weyerhaeuser.com

At least two emails were sent, but we never received a letter of support

Abutters with parts of their parcels in the Maidstone Lake watershed:

John Nugent, Span# 372-115-10230

Timothy Hall, Major Renaud, Span # 372-115-10141

MCLAIN REGINALD, Span# 372-115-10118

MCVETTY Alfred & Susan, Span# 372-115-10237

Liadsa Investments II LLC, Span # 372-115-10173

These abutters were not contacted.

Attachment 15

15 Supporting Documentation

15.1 Map with location information and delineated area for petition with known public and private conserved land within the watershed:

Map of conserved lands.pdf.

Roads surrounding Maidstone Lake .pdf

15.2 Water quality data:

Water Monitoring Data from DEC.xls**x**

Swimming data raw.pdf

15.3 Map of Rivers and Streams:

Lakes, rivers, streams.pdf

15.4 Recommended Supporting Data

15.4.1 Town Zoning Protection Plan:

Maidstone Lake zoning.pdf

15.4.2 Photos of the Petition Area:

Picture of Maidstone Lake 062319.pdf

15.4.3 Letters of Support

Letters of Support .pdf

Signatures_lake_owners.pdf

15.6 Additional Data

This information was sent out to all residents of the Town of Maidstone to make sure they were aware the petition was being submitted:

Answers to Questions_final.pdf

Attachment 16

16.1 List of Supporting Material Attached

File Name	Type	Date	Size KB
Maidstone_lake_reclass_082921	.pdf	08/29/21	1,100
Maidstone abutting landowners	.pdf	08/29/21	475
Map of conserved lands	.pdf	08/29/21	328
Roads surrounding maidstone lake	.pdf	08/29/21	209
Water Monitoring Data from DEC	.xlsx	08/29/21	90
Maidstone Lake zoning	.pdf	08/29/21	176
Picture of Maidstone Lake 062319	.pdf	08/29/21	517
Letters of Support	.pdf	08/29/21	1,000
Signatures_lake_owners	.pdf	08/29/21	935
Answers to Questions_final	.pdf	08/27/21	209
Swimming data raw	.pdf	08/31/21	4,600

Signature Certificate

Document Ref.: BVSPG-RXXZT-REIZO-SJ5TQ

Document signed by:

Jlm Mazzonna

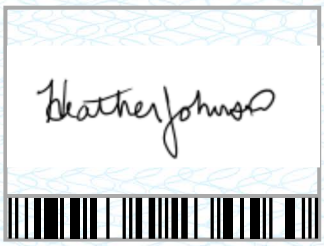
Verified E-mail:
jmazzonna@gmail.com

IP: 72.71.211.147 Date: 06 Sep 2021 16:17:35 UTC

Heather Johnson

Verified E-mail:
essexnrcd@gmail.com

IP: 99.196.168.84 Date: 06 Sep 2021 20:12:56 UTC



Doug Lord

Verified E-mail:
dougcarollord@gmail.com

IP: 64.222.98.118 Date: 07 Sep 2021 10:59:54 UTC

Document completed by all parties on:
07 Sep 2021 10:59:54 UTC